

1 JONATHAN DAVID FRANK
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2 San Diego, CA 92103
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3 State Bar Number 89384

4 Attorney for Material Witnesses

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417
13 v.)
14 BENNY LOPEZ,) DECLARATION OF ISAIAS
15 JUAN JOSE AGUIRRE-CRUZ) GUERRERO-MALDONADO IN
16 Defendants.) SUPPORT OF MOTION FOR
) VIDEO DEPOSITION OF
) MATERIAL WITNESSES
17 _____)
) DATE: JUNE 26, 2008
) TIME: 2:30 P.M.
) DEPT: PORTER

19 I am a material witness in the above action. I have personal
20 knowledge of the facts set forth in this action and could testify
21 competently thereto if called.

22 I have been in federal custody since May 12, 2008. I have been
23 held as a material witness in the above captioned case. I am unable
24 to locate an acceptable surety to post the Court bond and therefore
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.
27 I help support my father. I have been doing so as a field worker in

1 Mexico for the past four years. Each day that I spend in custody is
2 another day that I am unable to provide that support.

3 I declare under the penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct of
5 my own personal knowledge except as to those matters stated to be
6 based upon information and belief and, as to those matters, I am
7 informed and believe that they are true and correct. Executed this
8 June 4, 2008 in El Centro, California.

9 Isaias GUERRERO maldonado

10 ISAIAS GUERRERO-MALDONADO

11 *Translated by Frances T Young*
12 *Interpreted 6/4/08*
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417
13 v.)
14 BENNY LOPEZ,) DECLARATION OF MARCO
15 JUAN JOSE AGUIRRE-CRUZ) HERNANDEZ-QUIROZ IN
16 Defendants.) SUPPORT OF MOTION FOR
17) VIDEO DEPOSITION OF
18) MATERIAL WITNESSES
19)
20) DATE: June 26, 2008
21) TIME: 2:30 P.M.
22) DEPT: PORTER

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19 personal knowledge of the facts set forth in this action and could
20 testify competently thereto if called.

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22 held as a material witness in the above captioned case. I am unable
23 to locate an acceptable surety to post the Court bond and therefore
24 I remain in custody as I cannot secure my release on bond.

25 Each day I spend in custody is a hardship for me and my family.
26 I help to support my grandmother. I have been doing so working in
27 a tire shop for the past 8 years. Each day that I spend in custody

1 is another day that I am unable to provide that support.

2 I declare under the penalty of perjury under the laws of the
3 United States of America that the foregoing is true and correct of
4 my own personal knowledge except as to those matters stated to be
5 based upon information and belief and, as to those matters, I am
6 informed and believe that they are true and correct. Executed this
7 June 4, 2008 in El Centro, California.

8 MARCO H

9 MARCO HERNANDEZ-QUIROZ

10 *Translated by Francisco Hernandez
11 Interpreter - 6/4/08*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417
13 v.)
14 BENNY LOPEZ,) DECLARATION OF PEDRO
15 JUAN JOSE AGUIRRE-CRUZ) GAMBOA-OCANA IN SUPPORT
16 Defendants.) OF MOTION FOR VIDEO
) DEPOSITION OF MATERIAL
) WITNESSES
17)
18 _____ DATE: JUNE 26, 2008
19 TIME: 2:30 P.M.
20 DEPT: PORTER

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20 knowledge of the facts set forth in this action and could testify
21 competently thereto if called.

22 I have been in federal custody since May 12, 2008. I have been
23 held as a material witness in the above captioned case. I am unable
24 to locate an acceptable surety to post the Court bond and therefore
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.
27 I essentially am the sole means of support of my wife and two

1 children ages 7 and 3. My wife does work outside of the home part
2 time. I also help support my parents in Mexico. My mother has
3 diabetes. I have
4 been supporting my family working as a cook for the past 10 years.
5 Each day that I spend in custody is another day that I am unable to
6 provide that support.

7 I declare under the penalty of perjury under the laws of the
8 United States of America that the foregoing is true and correct of
9 my own personal knowledge except as to those matters stated to be
10 based upon information and belief and, as to those matters, I am
11 informed and believe that they are true and correct. Executed this
12 June 4, 2008 in El Centro, California.

PEDRO S GAMBOA OCANA

PEDRO GAMBOA-OCANA

16 Translated by: *Frances T. Homan*
17 Interpreter *6/4/08*

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9 SOUTHERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417

13

14 BENNY LOPEZ,) ANDRADE PEREZ IN SUPPORT
15 JUAN JOSE AGUIRRE-CRUZ) OF MOTION FOR VIDEO
) DEPOSITION OF MATERIAL
) WITNESSES

17

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20 knowledge of the facts set forth in this action and could testify
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22 I have been in federal custody since May 12, 2008. I have been
23 held as a material witness in the above captioned case. I am unable
24 to locate an acceptable surety to post the Court bond and therefore
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.
27 I am the sole support for my wife and two children, ages 15 and 7.

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1 I also help to support my parents and sister. My father has
2 hypertension and high blood pressure. I have been supporting my
3 family as a laborer in Mexico for about 23 years. Each day that I
4 spend in custody is another day that I am unable to provide that
5 support.

6 I declare under the penalty of perjury under the laws of the
7 United States of America that the foregoing is true and correct of
8 my own personal knowledge except as to those matters stated to be
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10 informed and believe that they are true and correct. Executed this
11 June 4, 2008 in El Centro, California.

Arturo Andrade

ARTURO ANDRADE-PEREZ

17 *Translated by: Frances T. Young*
18 *6/4/08*
19

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417
13 v.)
14 BENNY LOPEZ,) DECLARATION OF FRANCISCO
15 JUAN JOSE AGUIRRE-CRUZ) SORIA-OROZCO IN SUPPORT
16 Defendants.) OF MOTION FOR VIDEO
) DEPOSITION OF MATERIAL
) WITNESSES
17)
) DATE: JUNE 26, 2008
) TIME: 2:30 P.M.
) DEPT: PORTER

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22 I have been in federal custody since May 12, 2008. I have been
23 held as a material witness in the above captioned case. I am unable
24 to locate an acceptable surety to post the Court bond and therefore
25 I remain in custody as I cannot secure my release on bond.

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2 Each day I spend in custody is a hardship for me and my family.
3 I am the sole means of support for my common law wife, who is
4 pregnant and expecting in September. I also help to support my
5 parents. I have been so supporting my family by working
6 construction in Mexico for the past 10 years. Each day that I spend
7 in custody is another day that I am unable to provide that support.

8 I declare under the penalty of perjury under the laws of the
9 United States of America that the foregoing is true and correct of
10 my own personal knowledge except as to those matters stated to be
11 based upon information and belief and, as to those matters, I am
12 informed and believe that they are true and correct. Executed this
13 June 4, 2008 in El Centro, California.

Francis G. Sotica 0

FRANCISCO SORIA-OROZCO

Translated by Frances T. Horner
Interpreter
6/4/08